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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIKI OKJE ERDMANN-BROWNING
and JACQUELINE BENITEZ, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

TOM VILSACK, Secretary, United States
Department of Agriculture, in his official
capacity; SHALANDA YOUNG, Director of
the United States Office of Management and
Budget, in her official capacity.

Defendants.

Case No.: 3:23-cv-04678

**DECLARATION OF SHIMICA
GASKINS IN SUPPORT OF
PLAINTIFFS' *EX PARTE*
APPLICATION FOR TRO AND OSC
RE: PRELIMINARY INJUNCTION**

CLASS ACTION

Hearing Date: September 13, 2023
Time: TBD

Action filed: September 12, 2023

DECLARATION OF SHIMICA GASKINS

I, Shimica Gaskins, declare as follows:

1. I have personal knowledge of the facts in this declaration and am competent to testify to them.

2. I am President and Chief Executive Officer of Gather, Respect, Advocate, Change, Engage (GRACE) and End Child Poverty California.

3. GRACE's mission is to end child poverty in California. We work to achieve this goal through legislative advocacy and by raising public awareness of the child poverty crisis in California.

4. We are a hub for a major anti-poverty coalition of over 170 groups across California.

5. Our work is informed by the Lifting Children and Families Out of Poverty Task Force Report created in partnership with a range of expert anti-poverty stakeholders.¹ This Task Force developed a comprehensive state plan to dramatically reduce child poverty.² This is known as the End Child Poverty Plan. GRACE uses this plan to formulate action items to end child poverty. For example, we emphasize nutrition support programs and education because this is vital to lift children and families out of poverty.³

6. Across the country, households with children have a higher rate of food insecurity than households overall. Yet, California has the highest child poverty rate in the country.⁴ In California, CalFresh has reduced overall California poverty rates among children.

7. Many of GRACE's Steering Committee members are direct service providers,

¹ California Lifting Children and Families Out of Poverty Task Force, available at <https://www.endchildpovertyca.org/wp-content/uploads/2018/11/AB1520-Child-Poverty-Task-Force-Report-and-Recommendations-FINAL.pdf> (last visited September 12, 2023)

² The End Child Poverty Plan, available at <http://www.endchildpovertyca.org/#theplan> (last visited September 12, 2023)

³ Center on Poverty and Social Policy at Columbia University, available at <https://www.povertycenter.columbia.edu/news-internal/food-assistance-can-disrupt-intergenerational-poverty> (last visited September 12, 2023)

⁴ Public Policy Institute of California, available at <https://www.ppic.org/publication/poverty-in-california/> (last visited September 12, 2023)

1 providing a spectrum of family-facing support, including food assistance. This includes The
 2 California Association of Food Banks, and their member food banks, which are the backbone of
 3 the state's emergency food system and a major CalFresh outreach and application assistance
 4 network; Promise Neighborhoods which provide emergency food as well as CalFresh
 5 application assistance; and the California Alternative Payment Program Association CAPP
 6 agencies who help families enroll into CalFresh and host/partner with childcare and school
 7 system pantries.

8 8. These agencies have shared with GRACE the record impact community-based
 9 organizations are already facing given the "hunger cliff", as the loss of pandemic food supports
 10 caused SNAP households immediately to fall back into hunger, with the loss of 1/3 of federal
 11 nutrition safety net already this year.⁵ The hardship also has been widely reported in the
 12 media.⁶

13 9. The loss of these additional food benefits is expected to undermine the recent
 14 decline in child poverty.

15 10. CalFresh is the state's first line of defense against hunger. Disrupting these
 16 benefits would cause immense harm to the households who rely on the program to eat,
 17 overwhelm our partner food assistance agencies, and undermine GRACE's mission to end child
 18 poverty in California.

19 11. We are certain of these outcomes, as the harm was well documented just four
 20

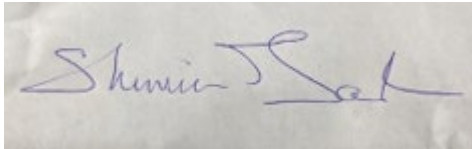
21 ⁵ California Association of Food Banks, available at [https://www.cafoodbanks.org/wp-](https://www.cafoodbanks.org/wp-content/uploads/2023/03/2023_Emergency-Allotments-PEBT_Factsheet.pdf)
 22 [content/uploads/2023/03/2023_Emergency-Allotments-PEBT_Factsheet.pdf](https://www.cafoodbanks.org/wp-content/uploads/2023/03/2023_Emergency-Allotments-PEBT_Factsheet.pdf). (last visited
 23 [September 12, 2023](https://www.cafoodbanks.org/wp-content/uploads/2023/03/2023_Emergency-Allotments-PEBT_Factsheet.pdf))

24 ⁶ CalMatters, *How hungry is California? Millions struggle to eat well in an abundant state*,
 25 available at <https://calmatters.org/explainers/california-hunger-crisis/> (last visited September 12,
 26 2023); Mercury News, *Catastrophic hunger crisis? California food banks flooded by families*
 27 *seeking help*, available at [https://www.mercurynews.com/2023/06/12/a-catastrophic-hunger-](https://www.mercurynews.com/2023/06/12/a-catastrophic-hunger-crisis-california-food-banks-are-being-flooded-by-families-seeking-help/)
 28 [crisis-california-food-banks-are-being-flooded-by-families-seeking-help/](https://www.mercurynews.com/2023/06/12/a-catastrophic-hunger-crisis-california-food-banks-are-being-flooded-by-families-seeking-help/) (last visited September
 12, 2023); Fox 5 News, *Hunger crisis expected in California as end of COVID-19 emergency*
prompts cuts to food security programs, available at [https://fox5sandiego.com/news/california-](https://fox5sandiego.com/news/california-news/hunger-crisis-expected-in-california-as-end-of-covid-19-emergency-prompts-cuts-to-food-security-program/)
[news/hunger-crisis-expected-in-california-as-end-of-covid-19-emergency-prompts-cuts-to-food-](https://fox5sandiego.com/news/california-news/hunger-crisis-expected-in-california-as-end-of-covid-19-emergency-prompts-cuts-to-food-security-program/)
[security-program/](https://fox5sandiego.com/news/california-news/hunger-crisis-expected-in-california-as-end-of-covid-19-emergency-prompts-cuts-to-food-security-program/) (last visited September 12, 2023)

1 years ago during the last major federal shutdown. *See*, Nutrition Policy Institute;⁷ UC Division
2 of Agriculture and Natural Resources, “Study: Government shutdown stressed food assistance
3 program participants (Sept. 30, 2021).⁸

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5 I declare under penalty of perjury that the foregoing is true and correct. I executed this
6 declaration on September 12, 2023, in Lake Arrowhead, CA.

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Date: September 12, 2023

Shimica Gaskins
President and CEO
GRACE/End Child Poverty, California

25 ⁷ Nutrition Policy Institute Research Brief, *How SNAP Participants Experienced the*
26 *2018-19 Government Shutdown and SNAP Benefit Disruption*, available at
<https://ucanr.edu/sites/NewNutritionPolicyInstitute/files/316104.pdf> (last visited September 12,
2023)

27 ⁸ Food News from UC Division of Agriculture and Natural Resources, available at
28 <https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=50526> (last visited September 12,
2023)